Tar

COVINGTON & BURLING 1201 Pennsylvania Avenue, N.W. P.O. Box 7566 Washington, D.C. 20044

> SENDER'S DIRECT DIAL: (202) 662-5212

Date: January 14, 1989

To: Fredric S. Newman

From: David H. Remes

Room: 803-E

9 pages follow

AUTOMATIC TELECOPIER NUMBERS: (Please send cover sheet)

(202) 737-0528: Groups I, II & III (202) 662-6285: Groups I, II & III (202) 662-6287: Groups I, II & III (202) 662-6288: Groups I, II & III (202) 662-6291: Groups II & III

Please call the following number if there are transmission problems or to confirm receipt of this document:

(202) 662-6280

Fred,

Attached is a memorandum discussing a table I have prepared at Lee Pollak's suggestion, comparing the figures we are supplying to Representative Luken with the figures in the December 1988 FTC report for the corresponding domestic brand styles. The FTC's figure for Virginia Slims Menthol Light 100's is 9, while our figure for that brand style in Singapore is 12. I will call Owen on Monday morning.

David